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16 Attorneys for Countrywide Defendants
Countrywide Financial Corporation; Countrywide Securities Corporation;
17 Countrywide Home Loans, Inc.; CWABS, Inc. and CWMBS, Inc.

18 **UNITED STATES DISTRICT COURT**
19 **CENTRAL DISTRICT OF CALIFORNIA**
20 IN re COUNTRYWIDE FINAN-
CIAL CORP. MORTGAGE-
BACKED SECURITIES LITIGA-
21 TION

22 Case No. 11-ML-02265-MRP (MANx)

23 **DEFENDANTS' NOTICE OF MO-**
TION TO COMPEL AND JOINT
STIPULATION REGARDING THE
PARTIES' DISCOVERY DISPUTE

24 IKB INTERNATIONAL S.A. IN
LIQUIDATION, et al.,
Plaintiffs,
25 v.
26 BANK OF AMERICA
CORPORATION, et al.,
Defendants.

27 Case No. 12-CV-06151-MRP (MANx)

28 Hearing Date: May 28, 2014
Time: 1:30pm
Courtroom: 12
Judge: Hon. Mariana R. Pfaelzer

Close of Fact Discovery: July 25, 2014
[DISCOVERY MATTER]

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF**
2 **RECORD:**

3 **PLEASE TAKE NOTICE** that Defendants Countrywide Financial Corpora-
4 tion, Countrywide Securities Corporation, Countrywide Home Loans, Inc., CWABS,
5 Inc. and CWMBS, Inc. move the Court for an order compelling Plaintiffs IKB Interna-
6 tional S.A. in Liquidation and IKB Deutsche Industriebank AG to provide a complete
7 answer to the Countrywide Defendants' interrogatory seeking information regarding
8 the misrepresentations pleaded in Plaintiffs' Complaint, specifically, the precise doc-
9 uments and statements that Plaintiffs contend were misleading, the individuals who
10 allegedly relied upon each of those statements and the date on and manner in which
11 such reliance occurred.

12 This motion is made pursuant to Rule 37 of the Federal Rules of Civil Proce-
13 dure and Local Rule 37.2, following a conference of counsel as required by Local
14 Rule 37.

15 This motion is based on this Notice of Motion and Motion, the Local Rule 37-2
16 Joint Stipulation, the accompanying Declaration of Matthew G. Lindenbaum and its
17 exhibits, and any other matter that the Court deems appropriate.

18 Dated: May 7, 2014

GOODWIN PROCTER LLP

19 _____
20 /s/ Brian E. Pastuszenski _____
21 _____
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23 Daniel J. Tyukody (SBN 123323)
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